1 Matthew S. Warren (Bar No. 230565) Jennifer A. Kash (Bar No. 203679) 2 Maissa Chouraki (Bar No. 307711) 3 WARREN LEX LLP 2261 Market Street, No. 606 4 San Francisco, California, 94114 5 +1 (415) 895-2940 +1 (415) 895-2964 facsimile 6 20-127@cases.warrenlex.com 7 8 Attorneys for HMD Global Ov 9 UNITED STATES DISTRICT COURT 10 FOR THE CENTRAL DISTRICT OF CALIFORNIA 11 12 SOUTHERN DIVISION 13 Case No. 8:20-mc-127 14 HMD GLOBAL OY, NOTICE OF MOTION AND MOTION 15 TO COMPEL PRODUCTION PRODUCTION OF DOCUMENTS Movant, 16 FROM ACACIA RESEARCH V. CORPORATION 17 ACACIA RESEARCH CORPORATION Judge: [TBD] Date: [TBD] Time: [TBD 18 Respondent. Place: 19 TBD Discovery Cutoff: March 18, 2021 Pretrial Conference: June 29, 2021 Trial Date: August 2, 2021 20 21 22 TO ALL PARTIES AND THEIR COUNSEL OF RECORD: 23 PLEASE TAKE NOTICE that at a date, time, and courtroom to be determined by 24 the Court, HMD Global Oy ("HMD Global"), defendant in *Cellular Communications* 25 Equipment LLC v. HMD Global Ov, Case No. 20-78 (E.D. Texas), will and hereby does 26 move this Court to compel Acacia Research Corporation to comply with HMD Global's 27 subpoena in that action of September 25, 2020. 28

This Motion is based on this Notice of Motion and Motion, the concurrently filed memorandum of law, the Declaration of Maissa Chouraki, and accompanying exhibits, as well as the pleadings and papers on file in this matter and in *Cellular Communications Equipment LLC v. HMD Global Oy*, Case No. 20-78 (E.D. Texas), any matters of which the Court may take judicial notice, and evidence or argument that HMD Global may present at or before the hearing on this matter.

As HMD Global explains in more detail in its brief, despite repeated efforts to resolve their differences through meeting and conferring in good faith, HMD Global and Acacia Research Corporation were unable to resolve the differences between them, requiring this motion.

Date: December 21, 2020

Respectfully submitted,

/s/ Matthew S. Warren

Matthew S. Warren (Bar No. 230565) Jennifer A. Kash (Bar No. 203679) Maissa Chouraki (Bar No. 307711) WARREN LEX LLP 2261 Market Street, No. 606 San Francisco, California, 94114 +1 (415) 895-2940 +1 (415) 895-2964 facsimile

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